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Via ECF and Facsimile (212) 805-6737

February 27, 2018

Honorable George B. Daniels
United States District Judge
United States Courthouse, Room 1310
500 Pearl Street
New York, New York 10007

Re: K7 Design Group, Inc., et al. v. Fashion Angels Enterprises, Inc., et al.
Case 1:17-cv-06943-GBD

Dear Judge Daniels:

Our firm represents the Defendants in the above-referenced matter. Defendants' time to answer the amended complaint in this action is February 28, 2018 pursuant to the stipulation so-ordered by this Court on February 20, 2018. The Plaintiffs filed a letter application ("Letter Application") on February 23, 2018 for leave to file a second amended complaint in this action. The Court granted Defendants leave to serve opposition to the Letter Application by March 9, 2018 and Plaintiff leave to serve a reply by March 23, 2018.

The parties have agreed to extend the Defendants' time to answer to five days beyond the Court's ruling on the Letter Application or, in the event the Court directs Plaintiffs to serve a second amended complaint other than as proposed in the Letter Application, Defendants' time to answer shall be extended to five days beyond its filing. This is the second request to extend the answer deadline after the Court's decision on the partial motion to dismiss. The parties have also agreed to proceed on discovery with respect to the claims that are not the subject of the Letter Application.

Accordingly, we respectfully request that the attached stipulation be so-ordered. If you have any questions, please feel free to contact me.

Respectfully submitted,

Carl F. Regelman

cc: Hilary A. Dinkelspiel, Adam Katz (Via E-mail and ECF)
GOLDBERG SEGALLA LLP
711 Third Avenue, Ste. 19
New York, New York 10017

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

K7 DESIGN GROUP, INC. and ISAAC KAPLAN,

Plaintiff,

-against-

FASHION ANGELS ENTERPRISES, INC., GOLDI
MILLER, MARK MILLER, MYRA MOULOUDJI, and
MARK RINCON,

Defendants.

No. 17 Civ. 06943 (GBD)

**STIPULATION AND
PROPOSED ORDER ON
EXTENDING TIME TO
RESPOND TO AMENDED
COMPLAINT**

WHEREAS, the Court decided a partial motion to dismiss the amended complaint on February 7, 2018; and

WHEREAS, Defendants' time to answer the amended complaint in this action is February 28, 2018 pursuant to the stipulation so-ordered by this Court on February 20, 2018; and

WHEREAS, the Plaintiffs filed a letter application ("Letter Application") on February 23, 2018 for leave to file a second amended complaint in this action; and

WHEREAS, the Court granted Defendants leave to serve opposition to the Letter Application by March 9, 2018 and Plaintiff leave to serve a reply by March 23, 2018;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned counsel that the Defendants' time to answer the amended complaint or second amended complaint in this action shall be extended to five days beyond the Court's ruling on the Letter Application, and this is the second request to extend this deadline after the Court's decision on the partial motion to dismiss; and

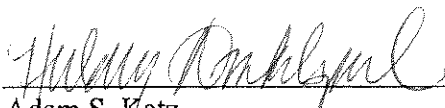
IT IS FURTHER STIPULATED that in the event the Court directs Plaintiffs to serve a second amended complaint other than as proposed in the Letter Application, Defendants' time to answer shall be extended to five days beyond its filing; and

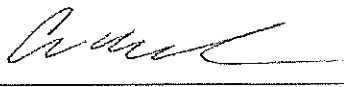
IT IS FURTHER STIPULATED that the parties may proceed on discovery with respect to the claims that are not the subject of the Letter Application, i.e., Plaintiff's claims for breach of contract, fraudulent inducement, and unjust enrichment; and

IT IS FURTHER STIPULATED that this stipulation may be executed in one or more counterparts, each of which shall be deemed an original and all of which together shall be deemed one instrument. Electronic or other copies of this stipulation shall be deemed valid and original.

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By: 
Adam S. Katz
Hilary A. Dinkelspiel

By: 
Carl F. Regelmann

Dated: 2/27/18

Dated: 2/27/18

SO ORDERED _____